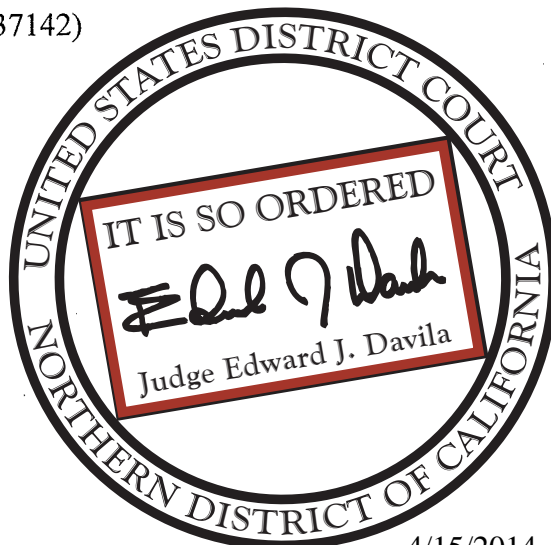


MANATT, PHELPS & PHILLIPS, LLP
SHARI MULROONEY WOLLMAN (Bar No. CA 137142)
E-mail: swollman@manatt.com
11355 West Olympic Boulevard
Los Angeles, CA 90064-1614
Telephone: (310) 312-4000
Facsimile: (310) 312-4224

KELLY L. KNUDSON (Bar No. CA 244445)
E-mail: KKnudson@manatt.com
One Embarcadero Center, 30th Floor
San Francisco, CA 94111
Telephone: (415) 291-7400
Facsimile: (415) 291-7474

Attorneys for Defendant,
Chiang Yo-mei a/k/a Yo-mei Chiang



4/15/2014

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT
SAN JOSE DIVISION

THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY,

Plaintiff,

vs.

Chiang Fang Chi-Yi, an Individual; Chiang
Yo-mei, an Individual; Chiang Hsiao-
chang, an Individual; Chiang Tsai-mei, an
Individual; Chiang Yu-sung, an Individual;
Chiang Yo-lan, an Individual; Chiang Yo-
bo, an Individual; Chiang Yo-chang, an
Individual; Chiang Yo-ching, an
Individual; Chungyan Chan, an Individual;
and Academia Historica, an entity of the
Republic of China,

Defendants.

No. CV 13-04383-EJD-HRL

**STIPULATION TO EXTEND TIME
TO RESPOND TO FIRST
AMENDED COMPLAINT TO
APRIL 28, 2014
(L.R. 6-1)**

Complaint Filed: September 20, 2013
Per Fed. R. Civ. Proc. 4(d)(3)
Current Response Date: April 14, 2014
New Response Date: April 28, 2014

1 WHEREAS Plaintiff THE BOARD OF TRUSTEES OF THE LELAND
2 STANFORD JUNIOR UNIVERSITY ("Plaintiff") filed and served its First
3 Amended Complaint in Interpleader pursuant to Rule 4(d)(3) of the Federal Rules
4 of Civil Procedure upon Defendant Chiang Yomei a/k/a Yomei Chiang
5 ("Defendant") on March 7, 2014;

6 WHEREAS Defendant's response to the First Amended Complaint is
7 currently due on April 14, 2014;

8 WHEREAS Defendant requests an extension of time for Defendant to
9 respond to the First Amended Complaint based on on-going negotiations between
10 the parties;

11 WHEREAS based upon those on-going discussions Plaintiff agrees that an
12 extension of time is warranted;

13 WHEREAS Defendant Academia Historica was just recently served, and its
14 answer to the First Amended Complaint is not due until June 9, 2014;

15 WHEREAS Defendant has requested, and Plaintiff has no objection to, an
16 extension for Defendant to respond to the Complaint, through and including April
17 28, 2014;

18 WHEREAS this is the first extension of time to respond to the First
19 Amended Complaint that Defendant has requested; and

20 WHEREAS nothing contained in this stipulation is intended to be, nor is it,
21 an admission by Defendant as to the validity of jurisdiction or venue, nor shall it
22 constitute a waiver of the right to object to personal jurisdiction or to venue.

23 IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

24 1. Defendant shall have to and including April 28, 2014, in which to
25 respond to the First Amended Complaint;

26 2. Nothing contained in this stipulation is intended to be, nor is it, an
27 admission by Defendant as to the validity of jurisdiction or venue, nor shall it
28 constitute a waiver of the right to object to personal jurisdiction or to venue.

1 3. This Stipulation is without prejudice to any party's rights, remedies,
2 defenses, or positions in the case.

3
4 Dated: April 14, 2014

MANATT, PHELPS & PHILLIPS LLP

5
6 By /s/
7 Shari Mulrooney Wollman
8 *Attorneys for Defendant*
Chiang Yo-mei (a/k/a Yo-Mei Chiang)

9 Dated: April 14, 2014

PILLSBURY WINTHROP SHAW
PITTMAN LLP

10
11 By /s/
12 Mark D. Litvack
13 *Attorneys for The Board of Trustees*
14 *of the Leland Stanford Junior*
University

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